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ABSTRACT

A summary is presented of the findings of a reseach team contracted to conduct a study of the evaluation process of the National Council for Accreditation of Teacher Education (NCATE). Criticism is leveled at the lack of in-depth examination of how well the NCATE standards are being implemented in the education programs of colleges, and a question is raised as to whether or not NCATE accreditation actually represents a guarantee of minimum quality. Some constraints on NCATE's capacity to bring about change are pointed out. Strengths in the NCATE process are also noted. Recommendations are made for improving NCATE's evaluation process. In this summary, the response of NCATE to the study is included in the form of a dialogue between NCATE and IRT's research team, and the NCATE executive resolution resulting from analysis of the research report is recorded. (JD)

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NCATE: DOES IT MATTER?
(Executive Summary)

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Institute for Research on Teaching

Teachers' thoughts and decisions are the focus of studies currently under way at Michigan State University's Institute for Research on Teaching (IRT). The IRT was founded in April 1976 with a $3.6 million grant from the National Institute of Education. That grant has since been renewed, extending IRT's work through September 1981. Funding is also received from other agencies and foundations. The Institute has major projects investigating teacher decision-making, including studies of reading diagnosis and remediation, classroom management strategies, instruction in the areas of language arts, reading, and mathematics, teacher education, teacher planning, effects of external pressures on teachers' decisions, socio-cultural factors, and teachers' perceptions of student affect. Researchers from many different disciplines cooperate in IRT research. In addition, public school teachers work at IRT as half-time collaborators in research, helping to design and plan studies, collect data, and analyze results. The Institute publishes research reports, conference proceedings, occasional papers, and a free quarterly newsletter for practitioners. For more information or to be placed on the IRT mailing list please write to : The IRT Editor, 252 Erickson, MSU, East Lansing, Michigan 48824.

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EXECUTIVE SUMMARY

This document reports a study of the National Council for Accreditation of Teacher Education (NCATE). It examines how NCATE applies its Standards and the effect of its procedures on the quality of programs in professional education. The study represents one of twelve proposed by the Institute for Research on Teaching (IRT) in response to a 1977 NCATE request for a comprehensive study of the accreditation process in education, including an examination of NCATE's own procedures and those of other accrediting organizations (i.e., regional agencies and State Departments of Education). NCATE requested that the comprehensive study also suggest new directions for improving the quality of professional education programs. This first study, which focused on NCATE, was funded jointly by the IRT and the Ford Foundation.

The Context

From 1974 to the present, numerous changes have occurred in NCATE that suggest the organization has begun to enforce its Standards more vigorously: its leaders have sought to create a new public image, its procedures have been altered, and its decisions to deny accreditation have increased.*

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*NCATE was formed in 1952 and began to accredit programs in 1954. NCATE's history to 1964 was described by John Mayor in his study, Accreditation in Teacher Education--Its Influence on Higher Education (Washington, D.C.: The National Commission on Accrediting, 1965). NCATE's history to the present will be covered in a dissertation study currently being conducted by NCATE's Associate Director.

In 1979, before the 32nd Annual Texas Conference on Teacher Education, NCATE's Director stated the organization's commitment to enforcement in the following way:

> ...[C]learly, the most dramatic change has come with NCATE's recognition as a standard-bearer in consumer protection. The National Council has officially pledged to defend the rights, responsibilities, and interests of the general public, of students, and of all parties having an interest in programs for the preparation of personnel for our nation's schools.
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> ....
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> In seeking to protect the public interest, the National Council has assumed and been assigned by both the Council on Post-Secondary Accreditation and the U.S. Office of Education the role of adjudging the quality of programs that prepare American teachers and school support personnel. NCATE accreditation now certifies to the public that programs have been evaluated and found to meet minimum standards of quality and are appropriate for the preparation of professionals and deserving of public trust and support.
>
> . . .
>
> Being a national, nongovernmental accrediting agency, NCATE has been successful in making accreditation decisions stick. Our belief is that we can give assistance to states in "taking the heat" for decisive action in curtailing ineffective and inefficient preparation programs....NCATE has demonstrated that it can stand the pressure of withdrawing accreditation of programs that cannot be professionally defended.

During the period 1974-78, NCATE's procedures for accreditation underwent significant change. Provisional (i.e., conditional) accreditation was discontinued; programs now are either granted or denied accreditation. Institutional reports now must follow a common format, and institutions must address every Standard. Visiting Teams now report findings Standard-by-Standard, make judgments on strengths and weaknesses, and reach consensus on whether requirements are met. Successful completion of an NCATE training session is required by NCATE staff and constituent groups

for participation on a Visiting Team. Council proceedings (except accreditation actions, including Audit Committee deliberations, and personnel matters) are now open to the public, and, while NCATE policy limits information on Council decisions, some newspapers recently have carried stories on NCATE actions with respect to specific schools. Finally, the number of decisions to deny accreditation has increased in the past few years. As Table 1 shows, over the period 1974-78, NCATE denied accreditation to nearly one in five institutions presenting one or more programs for accreditation, in contrast to a 1954-73 rate of one in ten. (In 1979, the denial rate was 20 percent.)

TABLE 1

NCATE Accreditation Decisions, 1954-73 and 1974-78

		Number Accredited	Number Denied Accreditation	Percent Denied Accreditation
1954-73	Institutions Presenting One or More Programs	936	111	10
1974-78	Institutions Presenting One or More Programs	326	77	19

SOURCE: Tabulations from NCATE's school accreditation record books.

While an analysis of the reasons behind these changes lies outside the scope of this report, the existence of changes provides ample justification for a study of their effects. NCATE appears to have the potential for affecting significantly the quality of professional personnel who enter our school systems.

Findings of the Study

This study found that this potential is realized, in part, for there are numerous strengths in the NCATE accreditation process:

1. Present practice generally uncovers major problems in a program of professional education.

2. NCATE regulates some of the worst programs of professional education. Programs denied accreditation suffer from numerous serious problems that run the gamut of NCATE's Standards. NCATE denial represents a clear signal to the public that a program is inferior (as judged by NCATE Standards).*

3. The NCATE accreditation process is carried out in a professional manner in that participants take their responsibilities seriously and seek to apply the Standards in an objective way.

4. Institutions observed for this study whose programs were accredited by the Council generally benefited from the process in that they attempted to modify some parts of their programs in response to NCATE concerns.

5. Denial of accreditation has led to some modifications in programs, according to a random sample of institutions with one or more programs denied accreditation between 1974 and 1978.

In addition to working to protect the public from poor quality programs through the accreditation process, NCATE recently has taken a leadership role in criticizing and exposing the practices of bogus

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*Other institutions with inferior programs may never submit them for NCATE accreditation. At the present time, over 1,100 institutions offer programs of professional education; NCATE accredits programs at only 537 institutions. However, it is estimated that between 70 and 80 percent of the new graduates in teacher education each year come from NCATE-approved programs.

Fear of denial is only one probable reason some institutions do not seek NCATE accreditation. Other institutions define their mission in areas NCATE does not emphasize (e.g., research). For that reason, they may see little value in NCATE accreditation. Others may feel NCATE evaluation is too expensive. Finally (but without exhausting the possibilities), others may feel that since state agencies have the legal responsibility for certifying graduates, they need be responsive only to Standards set by those agencies.

institutions. Under its present Director, NCATE has responded to a growing number of complaints from those victimized by so-called "universities" offering mail-order diplomas and spurious degrees. Staff have testified before Federal agencies, written articles for national journals, provided background information to news organizations investigating abuses, and given speeches on the subject. NCATE headquarters is now viewed by many as a center for information on such practices.

One result of NCATE's efforts has been an increase in prestige. In May 1980, NCATE announced three additional openings for Associate Member positions on the Council. Response was immediate; by September, eight organizations had submitted or were preparing applications. Institutions are seeking NCATE accreditation in greater numbers. Each academic year NCATE evaluates programs at sixty to seventy institutions. For the academic year 1980-81, fifteen additional schools have applied for initial accreditation. More than ever before, institutions planning to undergo NCATE evaluation are attending workshops on accreditation procedures. Institutions within states (Ohio) and within conferences (the "Big 10") have even held meetings to discuss the implications of the changing NCATE for their own programs. Finally, the U.S. Office of Education, in unconditionally granting renewal to NCATE as a nationally recognized accrediting agency for a period of four years, praised the organization and found that NCATE served clearly identified needs.

But, as this report makes clear, there are some critical weaknesses in the NCATE accreditation process. This study found that NCATE

Visiting Team and Council members generally look to see whether a task or function is being performed at all, not, as the NCATE Standards require, whether it is being performed well. This "presence-or-absence" approach to applying the Standards is pursued for several reasons:

1. Vagueness in NCATE's Standards and their general organization impede attempts to judge program quality.

2. Explanatory materials developed by NCATE neither define key terms nor suggest what evidence is sufficient to demonstrate that Standards have been met.

3. Training sessions for prospective team members and team chairpersons provide only a cursory discussion of the Standards.

4. Work conditions constrain the ability of NCATE participants to evaluate program compliance. Among those conditions are a lack of time and people and a large number of programs to be evaluated.

5. Inappropriate institutional influence over composition of evaluation teams, information available to Visiting Teams and the Council, and future participation of team members affects the ability of the Council to evaluate fully program compliance with NCATE Standards.

6. Certain dynamics in team visits and Council meetings virtually preclude a thorough and complete examination of programs. Among those dynamics are participation by team members who lack training, in violation of NCATE's operating policy; participation by state agency observers as regular team members, in violation of NCATE's official policy; limited team member use of NCATE manuals in gathering data; emphasis on a presence-or-absence approach by most team chairpersons; and confusion over specific procedures to be followed during the team visits by team chairpersons. Council consideration of program performance is constrained by role definitions that discourage attempts to go beyond information presented in Visiting Team Reports and by a lack of time.

The study found instances of "in-depth" examination of programs, but they were overshadowed by the prevelance of the presence-or-absence

approach. When the in-depth approach was taken, NCATE Visiting Teams and Council members applied nearly all the requirements in a Standard, gathered evidence and made judgments across Standards, and made decisions on the basis of the overall effects weaknesses had on programs. Such teams and Council members generally looked to see how well a task or function was being performed.

The use of the in-depth approach was found to be linked directly to the level of expectations set by the team chairperson or Council member. The tone established initially created an environment in which many of the constraints generally leading to a superficial review of program compliance were minimized. As a result, when the in-depth approach prevailed, negative evidence available to team and Council members was uncovered and used; when the presence-or-absence approach prevailed, it often was not.

The study found that the prevailing approach to accreditation had serious consequences for the NCATE accreditation process: many requirements in the Standards were not evaluated, some were interpreted in favor of the institution, and generally, the Standards were applied inconsistently. The presence-or-absence approach, while identifying many obvious weaknesses and usually leading to denial of accreditation for programs clearly inferior by NCATE Standards, also resulted in accreditation of programs as deficient as those denied. The study thus raises the question of whether NCATE's stamp of accreditation is a meaningful indicator of quality.

Finally, the study showed that NCATE's effect on program quality is very limited. NCATE's power base, professional authority, proved

weaker than the economic or legal authority exercised by other "levers of power" that affect programs of professional preparation (e.g., legislative action, competition from neighboring institutions, regulatory powers of State Departments of Education, and support from alumni, among other "levers").

It was found that if accreditation seemed likely, institutions responded to the Visiting Teams' findings by selecting weaknesses to be addressed according to what they considered important, not necessarily what NCATE considered the most serious weaknesses. If denial appeared to be a real possibility, institutions addressed more weaknesses of a more serious nature. When the Council did accredit programs, changes beyond those already in the works were not made; in fact, when accreditation seemed in danger but was granted, efforts to change came to a halt--and sometimes even lost ground. When accreditation was denied, institutions gave a second look at weaknesses identified by NCATE; they responded either by making numerous changes or by doing nothing at all. When change occurred, it generally involved outside "levers of power," as administrators sought to minimize any negative effects on student enrollment. In such cases, NCATE's role was more indirect than direct, often serving to trigger the involvement of other levers.

These weaknesses were related to three major constraints that shape the organization's activity. The first is power. NCATE's power rests, ultimately, on professional authority. Unlike an organization with legal authority, NCATE can only recommend and suggest, not require, that change be made. While such a power base is important, reliance on

professional authority alone, this study found, resulted in limited institutional change.

The second constraint involves money. NCATE's financial base depends heavily on revenue from the institutions it accredits. Approximately one-half its annual funds comes from institutions; the other half is contributed by constituent organizations that make up the Council. NCATE's Director repeatedly has pointed out the possible tension between efforts to regulate the marketplace (which imply higher denial rates) and continued institutional support for NCATE's activities.

The third constraint relates to NCATE operations. NCATE relies heavily on volunteer help. Visiting Team, Audit Committee, and Council members all contribute their time as part of their professional responsibility for improving programs for professional educators. There are limits to the demands NCATE can place on those who volunteer their time to carry out its functions.

These constraints should be kept in mind as the findings of this study are reviewed. They are important when considering possible reforms.

But constraints need not breed pessimism. NCATE has made numerous changes in recent years in an effort to monitor more effectively programs for professional educators. Moreover, its constituent members include a wide spectrum of organizations involved in the training of teachers and learning support personnel: public school teachers, teacher educators, students, school psychologists, administrators, counselors, chief state school officers, special educators, institutional officers,

public representatives and school board members. In contrast with most nongovernmental agencies that attempt to police their own ranks, NCATE's base is broader than simply the institutions it seeks to regulate. To some degree, the study concluded, NCATE can be the master of its own destiny.

After considering both constraints and opportunities, this report describes three possible directions for NCATE: (1) maintenance of the status quo; (2) improvements in the presence-or-absence approach; and (3) incremental change toward a more vigorous application of the Standards (the in-depth approach). The first two alternatives are rejected; the third is recommended.

If the third alternative were followed, NCATE's accreditation procedures would be revised and efforts would be made to improve NCATE's access to external levers of power. This report argues that these actions must be undertaken together if NCATE's ability to pursue its stated goal of protecting the consumer from inferior programs of professional education is to be improved. Suggested changes in accreditation procedures include: (1) changes in the format of the Standards; (2) development of a policy manual that provides a rationale for each Standard, shows how Standards are related to one another, and provides examples of appropriate and inappropriate practices drawn from Visiting Team Reports and Council decisions; (3) development of a second, more demanding, set of Standards to provide an incentive for additional institutions that feel they have truly outstanding programs to seek NCATE accreditation; (4) creation of a system for screening Institutional Reports and Visiting Team Reports to reduce the incidence of incomplete reports; (5) revision

of evaluation procedures to encourage in-depth penetration by team members; (6) modification of training sessions to promote greater understanding of all requirements; (7) changes in present Visiting Team procedures to promote more efficient use of time; and (8) consideration of increasing the size of teams and extending the team visit by one day.

To improve its access to external levers of power, NCATE might explore ways to: (1) make the public more aware of its accreditation decisions by expanding its dissemination activities; (2) improve relationships with certain State Departments of Education; (3) develop a link between eligibility for Federal funds and accreditation by a recognized program-accrediting agency; (4) increase the number of school districts that require applicants for employment to be graduates of NCATE-accredited schools; and (5) develop alternative sources of funding for its accrediting activities to reduce dependence on institutions.

The major disadvantages of this third alternative are: (1) until alternative funding sources are found, resources for beginning to change procedures and initiating studies of how to improve access to other levers of power must come from within the organization; (2) institutions would have to bear additional costs if team size were increased and team visits were extended by one day; (3) constituent member dues might have to support some increase in NCATE headquarters staff to implement procedural changes; and (4) more rigorous evaluation might tax the limits of voluntary participation.

Regardless of the direction NCATE might choose, costs are involved. In weighing the costs and benefits, the report concludes, NCATE must first decide what role it wants to play in protecting the consumer from poor quality programs in professional education.

STATEMENT OF REACTION TO IRT STUDY

Resolution Adopted by the
National Council for Accreditation of Teacher Education
October 20, 1980

1. History of the NCATE Study

This study originated on January 25, 1977, when the Council passed a motion (Fritschel/McDaniels) to sponsor "...a comprehensive study of national accreditation." It was prescribed that the "...study should address, but not be restricted to the following points: purposes of accreditation, including quality control, and stimulation for improvement; criteria for accredibility, including the reliability and validity of standards; procedures for accreditation, including program versus institutional accreditation, use of data retrieval systems, and audit techniques; governance of accreditation in teacher education; financial support; alternatives to NCATE; relationship to state agencies for certification; relationship to local employment agencies; role groups in accreditation, including trainees, practitioners, trainers, government agencies, and the public; and issues concerning overlapping jurisdictions between and among state, regional, and national accrediting groups."

It was recommended that the study be supervised by a Planning and Liaison Committee of nine persons selected as follows:

> Three from the National Education Association (two from the Council and one non-Council person appointed by the NEA); three from the AACTE (two from the Council and one non-Council person appointed by AACTE); one representative from other Council constituents elected by constituent representatives; one individual representing the Council associate members elected by associate member representatives; and one at-large member appointed by the Council on Postsecondary Accreditation.

A total of $7,000 was set aside for the purpose of initiating the study. Bids for the study were invited from the educational community at large. After a complex screening process, the Institute for Research on Teaching (IRT) was selected as the agency to conduct the study, and monies were accorded the IRT to assist them in seeking greater fiscal support. Financing was ultimately acquired from the Ford Foundation as well as internal IRT funds, primarily from the National Institute of Education.

In the fall of 1978, the IRT developed a proposal for a comprehensive study of national accreditation, investigating the broad range of areas prescribed for study by the original Council

action. When only limited funding was acquired however, the original scope was greatly narrowed. On several occasions the Planning and Liaison Committee met with the IRT staff to approve modifications in the scope and direction of the study. Ultimately, the study was directed at Item 1 of the 1977 goals--the application of NCATE's standards and the effects of its procedures upon teacher education programs.

2. NCATE's Positive Performance

The report demonstrates positive NCATE performance in the following areas:

A. Present practice generally uncovers major problems in a teacher education program.

B. NCATE regulates some of the worst programs in professional education. Institutions denied accreditation suffer from numerous serious problems that run the gamut of NCATE's Standards. NCATE denial represents a clear signal to the public that a program is inferior (as judged by NCATE Standards).

C. The NCATE accreditation process is carried out in a professional manner. Participants apply the Standards in an objective way.

D. Institutions observed for this study and accredited by the Council generally benefited from the process in that they attempted to modify some parts of their programs in response to NCATE concerns.

E. Denial of accreditation has led to some modifications in programs, according to a random sample of institutions with one or more programs denied accreditation between 1974 and 1978.

3. NCATE's Concerns About the Report

A. The IRT study does not place NCATE's organization, size, operation, standards, denial rate, or processes in context with other accrediting agencies, state approval efforts, or other systems of evaluation in higher education. Consequently, the impression is left that problems common to all such evaluating systems are uniquely NCATE's. Conversely, the Council's accomplishments in such areas as enforcement of standards, appeals procedures, and efficiency and economy of operation go without comparative notice.

B. The IRT study appears to assume that the issue of voluntary/developmental versus mandatory/regulatory postures has been decided in favor of the latter. While the Council's evolution in this regard clearly favors an increasing regulatory mode, developmental attributes are still present and championed by organizations and institutions alike. Their effects on Council processes and decisions are not described.

C. While many institutions fear that NCATE denies accreditation to deserving programs, the IRT study found no evidence that this was the case. Although this conclusion can be deduced from the study, the report does not underscore this highly positive finding to the degree that negative conclusions are emphasized. We find such imbalance unfortunately characterizes much of the report, although NCATE recognizes that it did request a review of problem areas in its processes and procedures.

4. Weaknesses in the NCATE Accreditation Process According to the IRT Study

The Council is committed to addressing the weaknesses in the NCATE process described in the report:

A. The predominance of an approach to accreditation that emphasizes whether a task or function is performed at all, rather than whether it is performed well as required by the NCATE Standards.

B. Vagueness in NCATE's Standards and their general organization that impede attempts to judge program quality.

C. Inappropriate institutional influence over the composition of evaluation teams, information available to the team and Council, and future participation of team members--all of which affect the ability of the Council to evaluate fully program compliance with NCATE Standards.

D. Certain dynamics in team visits and Council meetings that hamper thorough and complete examination of programs.

E. The consequences for the NCATE accreditation process of the failure of some teams to apply many requirements in the Standards, inconsistencies amoung teams in the application of the Standards, and any and all errors of process that result in the accreditation of programs that should be denied.

F. Over-dependency on factors of professional status, which has contributed to a relatively weak power base that detracts from NCATE's ability to improve programs of professional education.

5. Next Steps

NCATE finds the IRT study useful as a device for improving the conduct of its accreditation functions. In receiving the October 6th draft of the IRT study and in keeping with ongoing efforts to strengthen the impact of accreditation, NCATE will accelerate its review of standards and institutional review procedures. All Council members are encouraged to forward reactions and suggestions relative to the IRT study to the Council chair or director by December 1, 1980. To further facilitate the process of self-assessment, the Standards Committee is charged with reviewing all current standards in respect to the three recommendations of the IRT study. The report of the Standards Committee shall be an action agenda item at the next Council meeting.

NCATE EXECUTIVE COMMITTEE

Resolution

Whereas the IRT study is of real value, has been completed, is in its final revision, and is due November 1, 1980, for submission to the Ford Foundation, the Executive Committee recommends that:

1. a review of the final document, its conclusions and recommendations be studied, analyzed, and developed into appropriate strategies for action by committees selected and assigned by the Executive Committee;

2. appreciation be expressed for the work and activities of the Planning and Liaison Committee; and

3. the Executive Committee be charged to move with all deliberate speed in the pursuit of further potential studies of accreditation issues with IRT or other research agencies.

IRT RESPONSE TO NCATE'S STATEMENT OF REACTION TO THE IRT STUDY

On October 20, 1980, after extensive review of a draft of this report, the NCATE Council approved a Statement of Reaction which contained three concerns. Each is addressed in turn:

1. NCATE Concern

> The IRT study does not place NCATE's organization, size, operation, standards, denial rate, or processes in context with other accrediting agencies, state approval efforts, or other systems of evaluation in higher education. Consequently, the impression is left that problems common to all such evaluating systems are uniquely NCATE's. Conversly, the Council's accomplishments in such areas as enforcement of standards, appeals procedures, and efficiency and economy of operation go without comparative notice.

IRT Response

> The IRT is sensitive to this concern. As noted in the Executive Summary, this report is only one of twelve interdependent studies proposed by the IRT in response to NCATE's original 1977 request for a comprehensive review of the accreditation process. Its focus is on NCATE. Pending funding, future studies will address such issues.
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> It can be noted that regional accrediting bodies (among other types of accrediting agencies) have been criticized in a recent General Accounting Office Report* and that this paper suggests problems in state agency review of programs (pp. 192-196). While no conclusions can be drawn from such limited data, their existence suggests the need for additional research, which might indeed show

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*U.S. General Accounting Office, What Assurance Does Office of Education's Eligibility Process Provide? (Washington, D.C.: GAO, 1979), HRD-78-120.

that problems NCATE faces are common to all evaluating organizations. Such a study would also allow evaluation of NCATE's accomplishments from a comparative perspective.

2. NCATE Concern

The IRT study appears to assume that the issues of voluntary/developmental versus mandatory/regulatory postures has been decided in favor of the latter. While the Council's evolution in this regard clearly favors an increasing regulatory mode, developmental attributes are still present and championed by organizations and institutions alike. Their effects on Council processes and decisions are not described.

IRT Response

This study examines how NCATE applies its Standards and the effect of its process on the quality of programs in professional education. It is neither a historical study of NCATE nor a study of the validity of NCATE's Standards. Findings and recommendations for change should be reviewed in light of these limitations.

Within this context, the study relies on official Council declarations, speeches by the Director, and official NCATE documents that define its present mission, procedures, and responsibilities. Developmental attributes are described in the report (pp. 146-150) but are placed within the context of the prevailing regulatory posture. One alternative direction for change (improving the presence-or-absence approach) could be interpreted as a method for improving the developmental approach, while limiting the regulatory approach (pp. 200-201).

3. NCATE Concern

While many institutions fear that NCATE denies accreditation to deserving programs, the IRT study found no evidence that this was the case. Although this conclusion can be deduced from the study, the report does not underscore this highly positive finding to the degree that negative conclusions are emphasized. We find such imbalance unfortunately characterizes much of the report, although NCATE recognizes that it did request a review of problem areas in its processes and procedures.

IRT Reponse

IRT agrees that some readers may wish to draw this conclusion, but believes to do so would mean going beyond the data. The study showed that present practice generally uncovers major problems in a program. It showed that institutions denied accreditation suffer from numerous serious problems that run the gamut of NCATE's Standards. The report concludes, therefore, that NCATE denial represents a clear signal to the public that a program is inferior (as judged by NCATE Standards). This conclusion rests on interviews with program staff at institutions denied NCATE accreditation that accepted such decisions or appealed them but lost. Such program staff were found to agree with nearly every weakness identified by NCATE (p. 195).

This conclusion is different, however, from saying that NCATE never denies accreditation to deserving programs. Since NCATE Standards are applied in two different ways (the presence-or-absence approach and the in-depth approach), it is possible for a team that uses the presence-or-absence approach to find few weaknesses, but an Audit Committee that uses the in-depth approach to find many. This could lead to Council denial of accreditation, an action that might be questioned by an Appeals Board because favorable evidence available to the team was not available to the Audit Committee. Subsequent Council consideration could lead to accreditation. The text (p. 103) shows this sequence of events does occur. Observation of Council debates shows the organization is well aware of this problem, but has yet to devise a satisfactory solution. At the October 1980 meeting, the issue was again referred to committee for further study.

Finally, the IRT takes exception to the statement, "We find such imbalance unfortunately characterizes much of the report, although NCATE recognizes that it did request a review of problem areas in its processes and procedures."

NCATE requested a comprehensive study of the accreditation process. This first study of NCATE examined how NCATE applied its Standards and the effect of its process on the quality of programs of professional education. It was not designed to find problem areas. The results show that more problems than strengths were discovered, and both were reported.

The IRT wishes to express its pleasure that the Council, after detailed review of the final draft of this report, has found the study to be a useful device for improving the conduct of its accreditation functions, and has committed itself to address the weaknesses described in the report. It also notes that the Council, in a separate resolution, acknowledged the study to be of real value.